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**Counsel for ABG Partners and
The Graybow Group, Inc., Claimants**

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION CORPORATION,	:	Adv. Pro. No.: 08-01789 (BRL)
Plaintiff,	:	SIPA Liquidation
v.	:	(Substantively Consolidated)
-----	X	
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC.,	:	
-----	X	
Defendant.	:	
-----	X	
In re:	:	
-----	X	
BERNARD L. MADOFF,	:	
-----	X	
Debtor.	:	

**NOTICE OF ABG PARTNERS' AND THE GRAYBOW GROUP, INC.'S
MOTION FOR ENTRY OF ORDER FOR AUTHORITY TO AMEND CLAIM
(CLAIM NO. 6258) TO IDENTIFY MULTIPLE CUSTOMERS AND THEIR
DEPOSITS OR, ALTERNATIVELY, TO PERMIT FILING OF LATE CLAIM**

PLEASE TAKE NOTICE, that upon "ABG Partners' And The Graybow Group, Inc.'s (I) Objection To Trustee's Determination Of Claim And (II) Cross-Motion For Entry Of Order For Authority To Amend Claim To Identify Multiple Customers And Their Deposits or, Alternatively, To Permit Filing Of Late Claim" dated November 18, 2009 (the "Motion") (Docket No. 949), and upon the supporting Affidavit of Bruce Graybow (Docket No. 950), both filed on November 18, 2009 by ABG Partners and The Graybow Group, Inc. f/k/a Graybow Communications Group, Inc. (the "Claimants"), creditors and parties in interest in the above-captioned adversary proceeding, by their attorneys, Todtman, Nachamie, Spizz & Johns, P.C., Mansfield Tanick & Cohen P.A. and Parker & Wenner, P.A., the Claimants shall move before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at his courtroom located at the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York, on the **25th day of February 2010 at 10:00 A.M.** or as soon thereafter as counsel can be heard, for an order (a) granting Claimants leave to amend to amend their claim (Claim No. 6258) to clarify their separate deposits into the Account (as defined in the Motion) pursuant to Fed. R. Bankr. P. 7015 and Fed. R. Civ. P. 15(a)(2), or, in the alternative, (b) permitting Claimants to file a late claim pursuant to Fed. R. Bankr. P. 9006(b).

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Motion and the relief requested therein (i) must be made in writing, (ii) shall conform to the Bankruptcy Rules and Local Rules of the Bankruptcy Court for the Southern District of New York, and the Case Management Procedures Order, (iii) shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-182, which may be accessed through the internet at the

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Bankruptcy Court's website: www.nysb.uscourts.gov, using Netscape Navigator software version 3.0 or higher and in portable document format (PDF) using Adobe Exchange software for conversion (with hard copy delivered directly to the Chambers of the Honorable Burton R. Lifland, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004); (b) if a party is unavailable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number to which the objection refers and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use PDF format, such party shall submit the response or objection on a diskette in either Word, WordPerfect, or DOS text (ASCII) format . A response or objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth in this paragraph. Objections, if any, must be served upon Todtman, Nachamie, Spizz & Johns, P.C., 425 Park Avenue, New York, New York 10022, Attn: Janice B. Grubin, Esq., attorneys for the Claimants, so as to be actually received no later than **February 18, 2010 at 5:00 P.M.** Only those objections that are timely filed, served and received will be considered by the Bankruptcy Court at the Hearing.

PLEASE TAKE FURTHER NOTICE that if no objections to the Motion are timely filed, served and received in accordance with the Notice, the Bankruptcy Court may grant the relief requested in the Motion without notice or hearing.

Dated: New York, New York
January 11, 2010

TODTMAN, NACHAMIE, SPIZZ & JOHNS, P.C.
Attorneys for Claimants,
ABG Partners and The Graybow Group, Inc.
f/k/a Graybow Communications Group, Inc.

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